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October 27, 2020

**VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Akshay Aiyer*, 1:18-CR-00333 (JGK)

Dear Judge Koeltl:

We represent Defendant Akshay Aiyer in the above-captioned action. We respectfully request that the Court permit Mr. Aiyer to file publicly a redacted version of his Reply Memorandum of Law in Support of his Motion for Bail Pending Appeal (the “Reply Memorandum”) and an unredacted version of the Reply Memorandum under seal.

Mr. Aiyer’s Reply Memorandum addresses the issue of potential juror misconduct. Consistent with the Court’s prior handling of this issue, and to ensure juror privacy, Mr. Aiyer proposes to redact all portions of the Reply Memorandum dealing with this issue.

We discussed Mr. Aiyer’s proposed redactions to the Reply Memorandum with the Government, and they do not object his request.

Accordingly, we request that the Court enter an order permitting an unredacted version of Mr. Aiyer’s Reply Memorandum to be filed under seal.

Respectfully submitted,

/s/ Martin Klotz  
Martin Klotz

cc: Kevin Hart, Esq.  
Eric Hoffmann, Esq.  
Department of Justice, Antitrust Division (by e-mail)